

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Haliron Power, LLC,)	Civil Action No.: 6:18-cv-02911-TMC
)	
Plaintiff,)	
)	PLAINTIFF HALIRON POWER, LLC'S
vs.)	ANSWERS TO LOCAL RULE 26.01
)	INTERROGATORIES
Fluor Daniel Caribbean, Inc., a subsidiary of)	
Fluor Enterprises, Inc.,)	
)	
Defendant.)	
)	

Pursuant to Rule 26.01 of the Federal Rules of Civil Procedure, Plaintiff Haliron Power, LLC responds to Local Rule Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response: None.

B. As to each claim, state whether it should be tried jury or non-jury and why.

Response: All claims should be tried non-jury. The case concerns a dispute over payment for labor and equipment, supplies to Defendant for work on the power grid in Puerto Rico in response to the aftermath of Hurricanes Irma and Maria. This work was administered and paid for the Federal Government through the Army Corp of Engineers. Haliron anticipates amending its complaint to assert a Miller Act bond claim.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response: Haliron is not a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: This was negotiated and all administrative (except for some direct administration on the island) out of Defendant's Greenville, South Carolina office.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Response: None.

Respectfully submitted,

s/Thomas E. Dudley, III
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